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ACCESS AUTHORIZATION POLICY AND PROCEDURE

APB 2016-002

1-1-2016

PURPOSE

The purpose is to establish the policy and procedure for the Michigan Department of Health and Human Services (MDHHS) to establish procedures for granting workforce members access to Electronic Protected Health Information (ePHI) through workstations, programs, process or other methods.

DEFINITIONS

ePHI is the acronym for Electronic Protected Health Information. It is Protected Health Information that is transmitted or maintained in electronic form.

PHI is the acronym for Protected Health Information. It is information that can identify a person and contains health related data pertaining to that person.

Workforce Member means employees, volunteers and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers and staff from third party entities who provide service to the covered entity.

POLICY

It is the policy of MDHHS to grant authorization to workforce members before they are granted access to data containing sensitive data or ePHI.

PROCEDURE

MDHHS Security Officer/Supervisor

The MDHHS security officer or office supervisor will:

- Document the procedure for granting access to ePHI.
- Log and track authorization for access granted to workforce members.
- Periodically review and revise authorization of workforce member access to ePHI.

REFERENCES

45 CFR 164.308(a)(4)

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CONTACT

For additional information concerning this policy and procedure, contact the MDHHS Security Officer at MDHHSPrivacySecurity@michigan.gov.